

Mr. Jerry L. Sears
Premier Fiberglass
55080 Phillips Street
Elkhart, IN 46514

Re: 039-12629
First Significant Permit Modification to
Part 70 No.: T 039-7889-00336

Dear Mr. Sears:

Premier Fiberglass was issued a permit on February 9, 1999 for a fiberglass running board manufacturing operation. A letter requesting changes to this permit was received on August 17, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the removal of the baghouse monitoring conditions for the grinding area, Conditions D.2.5 and D.2.6. the grinding area is controlled by a filter and not a baghouse, the removal is necessary. Therefore, the conditions relating to baghouse inspections, failure and detection are removed from the permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NLJ

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Premier Fiberglass
55080 Philips Street
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7889-00336	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 9, 1999
First Administrative Amendment AA039-10944	Pages Affected: 5
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: July 26, 1999
First Significant Permit Modification	Pages Affected: 5, 30 and 31
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass running board manufacturing operation.

Responsible Official: John Kellog
Source Address: 55080 Philips Street, Elkhart, Indiana 46514
Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
SIC Code: 3792
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 1

- (a) one (1) gel coat spray booth, (ID No. Booth 1), utilizing an airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S1 and S2);
- (b) one (1) resin spray booth, (ID No. Booth 2), utilizing an air-assisted airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S3 and S4); and

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a filter for particulate matter control, and exhausting at one (1) stack (ID No. S5).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a filter for particulate matter control, and exhausting at one (1) stack (ID No. S5).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the plastic grinding area shall not exceed 0.93 pounds per hour when operating at a process weight rate of 218 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The filter for PM control shall be in operation at all times when the plastic grinding area is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the plastic grinding area filter stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the plastic grinding area filter stack exhaust.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for the First Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Premier Fiberglass
Source Location:	55080 Phillips Street, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	T 039-7889-00336
Operation Permit Issuance Date:	February 9, 1999
First Significant Permit Modification No.:	T 039-12629-00336
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed a modification application from Premier Fiberglass relating to the operation of a fiberglass running board manufacturing operation.

History

On August 17, 2000, Premier Fiberglass submitted an application to the OAM requesting the removal of the baghouse monitoring conditions listed in Section D.2, since the grinding operations are controlled by a filter and not a baghouse. Since the modification consists of the removal of monitoring conditions, the modification is considered to be significant based on 326 IAC 2-7-12(d). Premier Fiberglass was issued a Part 70 permit on February 9, 1999. On July 26, 1999, Premier Fiberglass was issued their First Administrative Amendment (039-10944-00336).

Existing Approvals

The source was issued a Part 70 Operating Permit (T039-7889-00336) on February 9, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 039-10944, issued on July 26, 1999.

Recommendation

The staff recommends to the Commissioner that the First Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 17, 2000.

Changes Proposed

The Office of Air Management (OAM) has reviewed an application from Premier Fiberglass,

relating to a permit modification to their existing Part 70 Operating Permit. The significant permit modification consists of removing the baghouse monitoring conditions listed in Section D.2 and adding filter language to Section D.2. This change is based on that the grinding area listed in Section D.2 is controlled by a filter and not a baghouse as listed in the original Title V permit. The baghouse was listed in the original Title V permit erroneously since the permit application listed the grinding area's control device as a filter. The source is proposing the following changes (changes are bolded and stricken out for emphasis):

1. Section A.3, Emission Units and Pollution Control Equipment Summary listed on page 5 of 36, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 1

- (a) one (1) gel coat spray booth, (ID No. Booth 1), utilizing an airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S1 and S2);
- (b) one (1) resin spray booth, (ID No. Booth 2), utilizing an air-assisted airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S3 and S4); and

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a ~~baghouse~~ **filter** for particulate matter control, and exhausting at one (1) stack (ID No. S5).

2. Section D.2, Facility Description listed on page 30 of 36, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

Facility Description [326 IAC 2-7-5(15)]

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a ~~baghouse~~ **filter** for particulate matter control, and exhausting at one (1) stack (ID No. S5).

3. Condition D.2.3, Particulate Matter listed on page 30 of 36, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

D.2.3 Particulate Matter (PM)

The ~~baghouse~~ **filter** for PM control shall be in operation at all times when the plastic grinding area is in operation and exhausting to the outside atmosphere.

4. Condition D.2.4, Visible Emissions Notations listed on pages 30-31 of 36, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the plastic grinding area ~~baghouse~~ **filter** stack exhaust shall be performed during normal daylight

operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
5. Conditions D.2.5 (Baghouse Inspections) and D.2.6 (Broken or Failed Bag Detection) listed on page 31 of 36, are removed from the Part 70 Operating permit because the grinding area is controlled by a filter and not a baghouse. The following conditions are renumbered accordingly.
6. Condition D.2.7, now re-numbered as D.2.5 - Record Keeping Requirements, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

D.2.75 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the plastic grinding area ~~baghouse~~ **filter** stack exhaust.
- ~~(b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.~~
- ~~(eb)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Potential To Emit

There is no increase in the potential to emit because the original potential to emit calculations for the grinding area were based on the criteria of the filter, including control efficiency. The baghouse was listed in the original Title V permit erroneously since the Title V permit application listed a filter as the control for the grinding area.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	1.9
PM-10	1.9
SO ₂	0.0

VOC	18.6
CO	0.0
NO _x	0.0
Styrene	17.3

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

There are no changes in the Federal Rule Applicability from the original Part 70 Operating Permit.

State Rule Applicability

There are no changes in the Federal Rule Applicability from the original Part 70 Operating Permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The grinding area has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the plastic grinding area baghouse filter stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the filter for the grinding area must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

Conclusion

The operation of this fiberglass running board manufacturing operation shall be subject to the conditions of the attached proposed First Significant Permit Modification No. T 039-12629-00336.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for the First Significant Permit Modification to a Part 70 Operating Permit

Source Name:	Premier Fiberglass
Source Location:	55080 Phillips Street, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	T 039-7889-00336
Operation Permit Issuance Date:	February 9, 1999
First Significant Permit Modification No.:	T 039-12629-00336
Permit Reviewer:	Nysa L. James

On October 12, 2000, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Premier Fiberglass submitted an application to the OAM requesting the removal of the baghouse monitoring conditions listed in Section D.2, since the grinding operations are controlled by a filter and not a baghouse. Since the modification consists of the removal of monitoring conditions, the modification is considered to be significant based on 326 IAC 2-7-12(d). The notice also stated that OAM proposed to issue a permit for this modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 11, 2000, Premier Fiberglass submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded and crossed out for emphasis):

Comment 1: The Responsible Official was changed from Jerry Sears to John Kellog through the source's First Administrative Amendment, AT-039-10944-00336 issued on July 26, 1999.

Response 1: Section A.1, General information listed on page 5 of 36, erroneously listed the incorrect Responsible Official in the draft permit modification. The revision is as follows (changes are bolded and crossed out for emphasis):

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass running board manufacturing operation.

Responsible Official:	Jerry L. Sears John Kellog
Source Address:	55080 Philips Street, Elkhart, Indiana 46514
Mailing Address:	55080 Philips Street, Elkhart, Indiana 46514
SIC Code:	3792
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
Minor Source, under PSD Rules;	
Major Source, Section 112 of the Clean Air Act	

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Premier Fiberglass
55080 Philips Street
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7889-00336	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 9, 1999
First Administrative Amendment AA039-10944	Pages Affected: 5
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: July 26, 1999
First Significant Permit Modification	Pages Affected: 5, 30 and 31
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass running board manufacturing operation.

Responsible Official: John Kellog
Source Address: 55080 Philips Street, Elkhart, Indiana 46514
Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
SIC Code: 3792
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 1

- (a) one (1) gel coat spray booth, (ID No. Booth 1), utilizing an airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S1 and S2);
- (b) one (1) resin spray booth, (ID No. Booth 2), utilizing an air-assisted airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S3 and S4); and

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a filter for particulate matter control, and exhausting at one (1) stack (ID No. S5).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a filter for particulate matter control, and exhausting at one (1) stack (ID No. S5).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the plastic grinding area shall not exceed 0.93 pounds per hour when operating at a process weight rate of 218 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The filter for PM control shall be in operation at all times when the plastic grinding area is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the plastic grinding area filter stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the plastic grinding area filter stack exhaust.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for the First Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Premier Fiberglass
Source Location:	55080 Phillips Street, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3792
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First Significant Permit Modification No.:	T 039-12629-00336
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed a modification application from Premier Fiberglass relating to the operation of a fiberglass running board manufacturing operation.

History

On August 17, 2000, Premier Fiberglass submitted an application to the OAM requesting the removal of the baghouse monitoring conditions listed in Section D.2, since the grinding operations are controlled by a filter and not a baghouse. Since the modification consists of the removal of monitoring conditions, the modification is considered to be significant based on 326 IAC 2-7-12(d). Premier Fiberglass was issued a Part 70 permit on February 9, 1999. On July 26, 1999, Premier Fiberglass was issued their First Administrative Amendment (039-10944-00336).

Existing Approvals

The source was issued a Part 70 Operating Permit (T039-7889-00336) on February 9, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 039-10944, issued on July 26, 1999.

Recommendation

The staff recommends to the Commissioner that the First Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 17, 2000.

Changes Proposed

The Office of Air Management (OAM) has reviewed an application from Premier Fiberglass,

relating to a permit modification to their existing Part 70 Operating Permit. The significant permit modification consists of removing the baghouse monitoring conditions listed in Section D.2 and adding filter language to Section D.2. This change is based on that the grinding area listed in Section D.2 is controlled by a filter and not a baghouse as listed in the original Title V permit. The baghouse was listed in the original Title V permit erroneously since the permit application listed the grinding area's control device as a filter. The source is proposing the following changes (changes are bolded and stricken out for emphasis):

1. Section A.3, Emission Units and Pollution Control Equipment Summary listed on page 5 of 36, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 1

- (a) one (1) gel coat spray booth, (ID No. Booth 1), utilizing an airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S1 and S2);
- (b) one (1) resin spray booth, (ID No. Booth 2), utilizing an air-assisted airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S3 and S4); and

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a ~~baghouse~~ **filter** for particulate matter control, and exhausting at one (1) stack (ID No. S5).

2. Section D.2, Facility Description listed on page 30 of 36, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

Facility Description [326 IAC 2-7-5(15)]

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a ~~baghouse~~ **filter** for particulate matter control, and exhausting at one (1) stack (ID No. S5).

3. Condition D.2.3, Particulate Matter listed on page 30 of 36, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

D.2.3 Particulate Matter (PM)

The ~~baghouse~~ **filter** for PM control shall be in operation at all times when the plastic grinding area is in operation and exhausting to the outside atmosphere.

4. Condition D.2.4, Visible Emissions Notations listed on pages 30-31 of 36, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the plastic grinding area ~~baghouse~~ **filter** stack exhaust shall be performed during normal daylight

operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
5. Conditions D.2.5 (Baghouse Inspections) and D.2.6 (Broken or Failed Bag Detection) listed on page 31 of 36, are removed from the Part 70 Operating permit because the grinding area is controlled by a filter and not a baghouse. The following conditions are renumbered accordingly.
6. Condition D.2.7, now re-numbered as D.2.5 - Record Keeping Requirements, is revised to reflect the correct control device of the grinding area (changes are bolded and stricken out for emphasis):

D.2.75 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the plastic grinding area ~~baghouse~~ **filter** stack exhaust.
- ~~(b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.~~
- ~~(eb)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Potential To Emit

There is no increase in the potential to emit because the original potential to emit calculations for the grinding area were based on the criteria of the filter, including control efficiency. The baghouse was listed in the original Title V permit erroneously since the Title V permit application listed a filter as the control for the grinding area.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	1.9
PM-10	1.9
SO ₂	0.0

VOC	18.6
CO	0.0
NO _x	0.0
Styrene	17.3

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

There are no changes in the Federal Rule Applicability from the original Part 70 Operating Permit.

State Rule Applicability

There are no changes in the Federal Rule Applicability from the original Part 70 Operating Permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The grinding area has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the plastic grinding area baghouse filter stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the filter for the grinding area must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

Conclusion

The operation of this fiberglass running board manufacturing operation shall be subject to the conditions of the attached proposed First Significant Permit Modification No. T 039-12629-00336.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for the First Significant Permit Modification to a Part 70 Operating Permit

Source Name:	Premier Fiberglass
Source Location:	55080 Phillips Street, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	T 039-7889-00336
Operation Permit Issuance Date:	February 9, 1999
First Significant Permit Modification No.:	T 039-12629-00336
Permit Reviewer:	Nysa L. James

On October 12, 2000, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Premier Fiberglass submitted an application to the OAM requesting the removal of the baghouse monitoring conditions listed in Section D.2, since the grinding operations are controlled by a filter and not a baghouse. Since the modification consists of the removal of monitoring conditions, the modification is considered to be significant based on 326 IAC 2-7-12(d). The notice also stated that OAM proposed to issue a permit for this modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 11, 2000, Premier Fiberglass submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded and crossed out for emphasis):

Comment 1: The Responsible Official was changed from Jerry Sears to John Kellog through the source's First Administrative Amendment, AT-039-10944-00336 issued on July 26, 1999.

Response 1: Section A.1, General information listed on page 5 of 36, erroneously listed the incorrect Responsible Official in the draft permit modification. The revision is as follows (changes are bolded and crossed out for emphasis):

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass running board manufacturing operation.

Responsible Official:	Jerry L. Sears John Kellog
Source Address:	55080 Philips Street, Elkhart, Indiana 46514
Mailing Address:	55080 Philips Street, Elkhart, Indiana 46514
SIC Code:	3792
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
Minor Source, under PSD Rules;	
Major Source, Section 112 of the Clean Air Act	